

### **REMARKS**

Claims 258-261 and 267-270 are presently pending in the patent application. Claims 212-257 and 262-266 are cancelled. New claims 267-270 are added and are consistent with the prior election of Group V.

#### **I. THE 35 U.S.C. § 103 REJECTION OF CLAIMS 258-261**

Claims 258-261 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Avnet *et al.* US 5,291,003 (“Avnet”) in view of Tran *et al.* (US 5,440,108)(“Tran”). Reconsideration and withdrawal of this rejection is respectfully requested.

Avnet is alleged to disclose a “modular cash card system design” comprising “receiving money inputted from said customer including at least bulk mixed coins” (*citing* col. 2, line 3), “[d]ispensing a card having a storage medium for storing a monetary value that is related to said total inputted value” (*citing* col. 2, line 9), “receiving a credit card from said customer so as to deduct an amount from a line credit from said credit card” (*citing* col. 2, lines 3-21), and that the act of receiving money “includes receiving bills from said customer.” (*citing* col. 2, line 3).

Avnet is acknowledged not to disclose or suggest discriminating between authentic and non-authentic forms of money, determining a total inputted value of authentic money, adding an amount from a line of credit or receiving instructions from a customer regarding the amount to deduct from a line of credit. To make up for this deficiency, the Examiner cites Tran as allegedly disclosing a “system and method for dispensing and revaluing cash cards” which includes “validating systems such as bill validators or ... credit and debit card validators” (*citing* Abstract), “value accumulation by the controller circuitry equivalent to the total of the value of the bills inserted” (*citing* col. 3, lines 51-68), and allowing the user to select an amount to be deducted from a credit or debit card as inputted value (see at least Figure 10B, Step 754). The Examiner concludes, in view thereof, that “[i]t would therefore be obvious to one of ordinary skill in the art at the time of invention to incorporate the validation, accumulation, and user interface elements of Tran into the system design of Avnet in order to implement the design of Avnet in a functional manner.”

Avnet does not disclose or suggest an “act of receiving money input by said customer comprising substantially simultaneously receiving, in a bulk coin receptacle, randomly oriented bulk coins input by said customer.” As noted by the Examiner, Avnet discloses on col. 2, line 3, that Avnet accepts “coins”. Avnet relates to vending machine apparatus and methods and,

although noting that “[t]ypically, a vending machine accepts payment in the form of coins and paper currency” (col. 1, lines 30-31), the preferred embodiment that is illustrated in FIGS. 1-5 entirely omits a coin slot in favor of a component 14 that consists of a currency acceptor 16 and a card acceptor 17. Despite the Examiner’s assertion that Avnet discloses “receiving money inputted from said customer including at least bulk mixed coins,” Avnet in fact discloses and suggests nothing more than a conventional vending machine apparatus comprising a coin slot that is not configured to permit substantially simultaneously receiving, in a bulk coin receptacle, randomly oriented bulk coins input by a customer. Likewise, Avnet fails to disclose or suggest, for example, an act of “singulating the bulk coins using a coin separation device.”

Tran likewise fails to disclose or suggest “act of receiving money input by said customer comprising substantially simultaneously receiving, in a bulk coin receptacle, randomly oriented bulk coins input by said customer” or an act of “singulating the bulk coins using a coin separation device.” Instead, Tran discloses a “[m]eans for accepting coins 435” that is a conventional vending machine coin acceptor, an example of which is provided as the MC5 Coin Changer manufactured by Mars Electronics. As shown in FIGS. 13 and 15, this conventional vending machine coin acceptor 435 include a slot into which coins may be inserted in a specified orientation one-at-a-time.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981 (CCPA 1974). Applicants respectfully submit that Avnet and Tran fail to disclose or suggest, singly or in combination, all of the claim limitations of independent claim 258 or of claims depending therefrom.

## **II. NEW CLAIMS 268-270**

Similar to claim 258, discussed above, applicants respectfully submit that Avnet and Tran fail to disclose or suggest, singly or in combination, at least the acts of “receiving bulk coins input by said customer, said act of receiving bulk coins comprising substantially simultaneously receiving, in a bulk coin receptacle, randomly oriented bulk coins input by said customer” or “singulating the bulk coins using a coin separation device.”

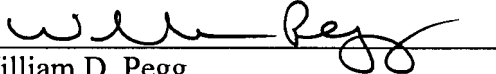
### **III. Conclusion**

If there are any matters which may be resolved or clarified through a telephone interview, the Examiner is respectfully requested to contact the undersigned attorney at the number indicated.

The Applicants submit that the claims are in a condition for allowance and action toward that end is earnestly solicited. It is believed that no fees are due; however, should any additional fees be required (except for payment of the issue fee), the Commissioner is authorized to deduct the fees from Nixon Peabody LLP Deposit Account No. 50-4181, Order No. 247171-000373USD1.

Respectfully submitted,

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Date

  
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